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17 **UNITED STATES DISTRICT COURT**
18 **EASTERN DISTRICT OF CALIFORNIA**

19 CHRISTINA TORREZ,

Case No.: 2:22-CV-01531-TLN-KJN

20 Plaintiff,

**JOINT STIPULATION TO CONTINUE
VDRP MEDIATION COMPLETION
DEADLINE; ORDER**

21 vs.

22
23 TEEMA, INC., a Delaware
24 corporation; and DOES 1 through
50, inclusive,

25 Defendants.
26

1 **TO THE HONORABLE COURT:**

2 Plaintiff Christina Torrez and Defendant TEEMA, Inc., by and through their
3 undersigned counsel, hereby jointly move this Court for an order continuing the
4 Voluntary Dispute Resolution Program (“VDRP”) mediation completion deadline,
5 as set forth below, for the following reasons:

6 1. This case was removed from state court on August 31, 2022.

7 2. On December 28, 2022, the Parties prepared and filed a Joint
8 Scheduling Report which set forth their agreement to submit the matter to mediation.
9 The Court and the VDRP Administrator appointed Robert Chalfant as the VDRP
10 neutral attorney on November 23, 2022.

11 3. The Parties spent December exchanging written discovery and serving
12 subpoenas on third parties.

13 4. The Parties require additional time to complete depositions, including
14 the depositions of Plaintiff and Defendant in advance of the VDRP mediation
15 deadline, which is currently set for February 22, 2023.

16 5. The Parties have met and conferred and now request an additional forty-
17 five (45) days from the current deadline of February 22, 2023 to complete
18 depositions and the VDRP mediation. The continued deadline to complete the VDRP
19 mediation would be on or about **April 10, 2023**.

20 6. Based on the foregoing, the Parties respectfully submit that good cause
21 exists and request that the court grant this joint request.

22 DATED: January 17, 2023

23 DIVERSITY LAW GROUP, P.C.

24
25 By: /s/ Kristen M. Agnew
26 Larry W. Lee
27 Kristen M. Agnew
28 Nicholas Rosenthal

1 DATED: January 17, 2023
2

FISHER & PHILLIPS LLP

3 By: */s/ Amy L. Lessa*
4

Amy L. Lessa

5 Lauren Bushman

6 Attorneys for Defendant TEEMA, Inc.
7

8 **ATTESTATION REGARDING ELECTRONIC SIGNATURES**

9 I, Amy Lessa, attest that all other signatories to this document, on whose
10 behalf this filing is submitted, concur in the filing's content and have authorized this
11 filing. I declare under penalty of perjury, under the laws of the United States of
12 America and the State of California, that the foregoing is true and correct.
13

14 */s/ Amy L. Lessa*
15 Amy L. Lessa
16

ORDER

Good cause appearing, the Joint Stipulation to Continue the VDRP Mediation Completion Deadline is granted, and IT IS HEREBY ORDERED that the VDRP Mediation Completion Deadline be continued to April 10, 2023.

IT IS SO ORDERED.

DATED: January 17, 2023

Troy L. Nunley

Troy L. Nunley
United States District Judge